UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

MDL No. 2875

THIS DOCUMENT RELATES TO ALL CASES

HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

CERTIFICATION OF ROSEMARIE RIDDELL BOGDAN IN SUPPORT OF <u>PLAINTIFFS' REPLY BRIEF IN SUPPORT OF DAUBERT MOTION TO PRECLUDE</u> OPINIONS OF DEFENSE EXPERT GEORGE E. JOHNSON, Ph.D.

Rosemarie Riddell Bogdan, hereby certifies as follows:

- 1. I am an attorney at law within the State of New York and a partner with the law firm of Martin, Harding & Mazzotti, LLP, and serve as Court-appointed Plaintiffs' Steering Committee Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' reply brief in support of *Daubert* motion to preclude opinions of defense expert George E. Johnson, Ph.D.
- 2. Attached hereto as **Exhibit DD** is a true and accurate copy of Plaintiffs' Rule 26 Expert Report of Dipak Panigrahy, M.D. and Addendum.
- 3. Attached hereto as **Exhibit EE** is a true and accurate copy of *Berman v. Mobil Shipping & Transp. Co.*, 2019 WL 1510941; 2019 U.S. Dist. LEXIS 55671 (2019).
- 4. Attached hereto as **Exhibit FF** is a true and accurate copy of *Gorton v. Air & Liquid Sys. Corp.*, 2020 WL 4193649; 2020 U.S. Dist.. LEXIS 129606 (M.D. Pa. 2020).
- 5. Attached hereto as **Exhibit GG** is a true and accurate copy of *Hoffeditz v. AM Gen, LLC*, 2017 U.S. Dist. LEXIS 123493; 2017 WL 3332263 (D.N.J., 2017).

- 6. Attached hereto as **Exhibit HH** is a true and accurate copy of Plaintiffs' Rule 26 Expert Report of David Madigan, Ph.D.
- 7. Attached hereto as **Exhibit II** is a true and accurate copy of Environmental and Molecular Mutagenesis Editorial Board, 2020.

MARTIN, HARDING & MAZZOTTI LLP Attorneys for Plaintiffs

By: /s/ Rosemarie Riddell Bogdan

Dated: January 6, 2022

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Rosemarie Riddell Bogdan

Rosemarie Riddell Bogdan